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Attorney for Debtor(s)
THOMAS JOHN WOOD and
DAWN M. WOOD

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In re:
THOMAS JOHN WOOD and
DAWN M. WOOD,

Case No.: 10-32556-B-13J
Mtn. Ctrl. No. JT-3
In Chapter 13
DATE: December 7, 2010
TIME: 9:32 a.m.
DEPT: B, CTRM 32
Honorable Thomas C. Holman

Debtor(s).

MOTION FOR PERMISSION FOR MORTGAGE MODIFICATION

TO: THE HONORABLE UNITED STATES BANKRUPTCY COURT JUDGE; THE
UNITED STATES TRUSTEE; CHAPTER 13 TRUSTEE, LAWRENCE J. LOHEIT; AND TO
ALL OTHER INTERESTED PARTIES:

The motion of debtors, THOMAS JOHN WOOD and DAWN M WOOD for permission for
a Mortgage Modification of existing home loan respectfully represents:

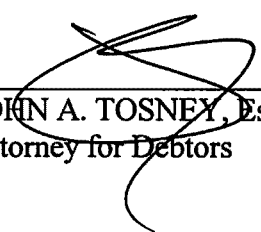
1. The proposed new debt is a single loan incurred only to modify the Debtors'
existing mortgage encumbering his residence commonly known as 6385 Griffith Avenue,
Marysville, CA, 95901.

1 2. Recently, Debtors had been given the opportunity to modify their existing home
2 mortgage. The mortgage modification would be for a new principal balance in the amount of
3 \$275,808.22 with an interest rate at 2.125%. The new principal and interest mortgage payment
4 which includes taxes and insurance will be in the amount of \$1,515.67.
5

6 3. The mortgage modification sought would incorporate the pre-petition mortgage
7 arrears into the new principal balance of the loan and would decrease their ongoing mortgage
8 payment. The mortgage modification would be beneficial to Debtors based on the grounds that
9 their budget has changed since the filing of their case. Debtor's permanently disabled mother has
10 moved in with Debtors which has increased the Debtors expenses for such items as food and higher
11 utilities bills. A Motion to Modify Chapter 13 plan has also been filed that will remove the ongoing
12 mortgage payment from Class 1 and has now listed the mortgage payment in Class 4 of their plan.
13 Along with the Motion to Modify an Amended Schedules I&J have also been filed.
14

15 WHEREFORE, Debtors, THOMAS JOHN WOOD and DAWN M. WOOD, respectfully
16 prays for an Order granting permission to modify his existing home mortgage.
17

18 Dated: _____
19

20 By:  _____
21 JOHN A. TOSNEY, Esq.
22 Attorney for Debtors
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